Supplemental Statement

OMB No. 1105-0002

Pursuant to Section 2 of the Foreign Agents Registration Act of 1938, as amended.

		4 DEC 1991	
For Six Mon	th Period Endin	(Insert date)	
Name of Registrant		Registration No.	
ARNOLD & PORTER		1750	
Business Address of Registrant			
1200 New Hampshire Av Washington, DC 20036	-	STRANT	
1. Has there been a change in the information	previously furn	shed in connection with the fol	lowing:
(a) If an individual: N/A			
(1) Residence address	Yes □	No Cl	
(2) Citizenship	Yes □	No 🖽	
(3) Occupation	Yes 🚨	No □	
(b) If an organization:			
(1) Name	Yes □	No 🛭	
(2) Ownership or control	Yes □	No 🖄	
(3) Branch offices	Yes D3	No □	
2. Explain fully all changes, if any, indicated in During this six-month New York branch office	n reportin ce moved t 399 Park	o the following add	
		92 F	
IF THE REGISTRANT	I IS AN INDIVIDUA	I., OMIT RESPONSE TO TEMS 2, 4,	iiid 5.
		/	The during this 6 month reporting
3. Have any persons ceased acting as partners, period? Yes ⊠ No □	officers, directo	s or similar officials of the registr	
If yes, furnish the following information:			
Name	Positie	n	Date Connection
Deborah Prutzman	Par	tner	<i>Ended</i> 7/11/91
In addition, Mark H. Victorie E. Schonfeld Registration Statemen	d, who hav	e previously filed	Short Form

are hereby terminated.

of Registrant's foreign principals. These Short Form Registrations

١.	Have any persons become Yes ₩ No □	ne partners, officers, di	rectors or similar officia	als during this 6 mont	h reporting period?
	If yes, furnish the following	g information:			
	Name	Residence Address	Citizenship	Position	Date Assumed
	Martha Belcher	770 Flintridge La Canada, Cal		Partner	7/1/91
,	Has any person named in Yes □ No ☒ */			the interests of any forei	gn principal?
	If yes, identify each such p	person and describe his se	rvices.		
	<u>*</u> / s	ee Attachment 5 <i>1</i>	A		
ś.	Have any employees or inc employment or connection				ent, terminated their No □
	If yes, furnish the following	g information: See	Attachment 6A		
	Name	Posit	ion or connection		Date terminated
7,	During this 6 month report rendered services to the re secretarial, or in a related If yes, furnish the following	gistrant directly in further or similar capacity?	ns been hired as employee ance of the interests of a Yes ☑ No □	es or in any other capacity l ny foreign principal in otl	by the registrant who ner than a clerical or
	Name	Residence Address		ltion or D nection	ate connection began

See Attachment 7A

the we

II—FOREIGN PRINCIPAL

	** * * * * * * * * * * * * * * * * * * *		(PAGE 3)
8.	Has your connection with any foreign prinicpal ended during this 6 month reporting period?	Yes ⊠	No □
	If yes, furnish the following information:		
	Name of foreign principal	Date of Ten	mination
	Asociacion Venezolana de Productores de Cementos	July 6,	1991 2
9.	Have you acquired any new foreign principal ¹ during this 6 month reporting period?	Yes ⊠ No □]
	If yes, furnish following information:		
	Name and address of foreign principal See Attachment 9A	Date	acquired
10.	In addition to those named in Items 8 and 9, if any, list the foreign principals whom you con 6 month reporting period.	linued to represent du	 iring the
	See Attachment 10A		
	III—ACTIVITIES		
11.	During this 6 month reporting period, have you engaged in any activities for or rendered any se	ervices to any foreign p	principal

See Attachment 11A

If yes, identify each such foreign principal and describe in full detail your activities and services:

A registrant who represents more than one foreign principal is required to list in the statements be files under the Act only those foreign principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

^{*/} After this date, representation of this foreign principal is limited to activities exempt from registration under Section 3 of the Act.

¹The term "foreign principal" includes, in addition to those defined in section 1(b) of the Act, an individual or organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a)(9)).

12.	During this 6 n	nonth reporting period No □	i, have you on behalf	of any foreign	principal engaged in	political activity ² as defi	ned below?
	the relations, i arranged, spoi	nterests and policies s	ought to be influence eeches, lectures or	ced and the me	ans employed to ac	ity, indicating, among o hieve this purpose. If th tails as to dates, places	e registrant
			See Attach	ment 12A			
						:	
				·			
13.	In addition to t your foreign p	he above described ac rincipals? Yes	tivities, if any, have y s □ No 🗷		activity on your ow	n behalf which benefits	any or all of
	If yes, describe	e fully.					
		N/A					

²The term "political activities" means the dissemination of political propagands and any other activity which the person engaging therein believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, persuade, or in any other way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

IV-FINANCIAL INFORMATION

14. (a) RECEIPTS—MONIES During this 6 month statement, or from an either as compensati	y other source, for or in the interest	ed from any foreign principal name s of any such foreign principal, any co No ロ	ed in Items 8, 9 and 10 of this ontributions, income or money
	If yes, set forth below	w in the required detail and separa	ntely for each foreign principal an a	ccount of such monies.3
	Date	From Whom	Purpose	Amount
		See Attachr	ment 14A	
				Total
(During this 6 month named in Items 8, 9 Yes \(\square\) No \(\frac{1}{2} \)	reporting period, have you receive and 10 of this statement, or from an	d any thing of value other than more yother source, for or in the interests	ney from any foreign principals s of any such foreign principal?
	If yes, furnish the fo	ollowing information:		
	Name of foreign principa	Date il received	Description of thing of value	Purpose
		N/A		

³A registrant is required to file an Exhibit D if he collects or receives contributions, loans, money, or other things of value for a foreign principal, as part of a fund raising campaign. See Rule 201(c).

4Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

gn principal? ail and separately n principal. hom	for each foreign	n principal an account of s	such monies, inc
hom			
		Purpose	A
See Attacl	hment 15A		

Total

						(PAGE 7
15.	(b) D	ISBURSEMENTS-	THINGS OF VALUE			
	C	Ouring this 6 motonnection with	onth reporting period, have yo activities on behalf of any for	u disposed of anything reign principal named	g of value ⁵ other than mo in items 8, 9 and 10 of	ney in furtherance of or in this statement?
	If yes	s, furnish the fol	lowing information:			
		Date disposed	Name of person to whom given	On behalf of what foreign principal	Description of thing of value	Purpose
			N/A			
	Durin other in cor Yes	ng this 6 month in person, made an innection with an innection with an innection with an innection in innect	ITICAL CONTRIBUTIONS reporting period, have you from the contributions of money or only primary election, convention */ www.comparts.comp	ther things of value ⁵ in	connection with an electi	on to any political office, o
	Date		Amount or thing of value	Name politi organiz	ical	Name of candidate
1	<u>*</u> /	statement	the following pers s have made polition for federal office	ical contribut		
			See	e Attachment 1	15C	
			V—PO	LITICAL PROPAGAN	DA	
bel	nmuni ieves v	ication or expre	Act defines "political propag ssion by any person (1) which intends to, prevail upon, indo	h is reasonably adapte octrinate, convert, indu	ed to, or which the personce, or in any other way is	on disseminating the same

political, or religious disorder, civil riot, or other conflict involving the use of force or violence in any other American republic or the overthrow of any government or political subdivision of any other American republic by any means involving the use of force or violence.)

16. During this 6 month reporting period, did you prepare, disseminate or cause to be disseminated any political propaganda as defined above? Yes 🖾 No □

IF YES, RESPOND TO THE REMAINING ITEMS IN THIS SECTION V.

- 17. Identify each such foreign principal.
 - 1) Bank of Montreal:
 - 2) Republic of Venezuela

18.	During this 6 month reporting period, has any foreign principal established a budget or allocated a specified sum of money to finance your activities in preparing or disseminating political propaganda? Yes □ No ☒				
	If yes, identify each such foreign	gn principal, specify amount,	and indicate for what	period of time.	
		N/A			
<u> </u>	During this 6 month reporting		preparing, disseminati	ng or causing the diss	emination of political
	propaganda include the use o ☐ Radio or TV broadcasts	☐ Magazine or newspaper articles	☐ Motion picture f	ilms 🖾 Letters	or telegrams
	☐ Advertising campaigns	☐ Press releases	Pamphlets or other publications		es or eches
	☑ Other (specify)posit	ion statement			
20.	During this 6 month reporting following groups:	period, did you disseminate o	r cause to be dissemin	ated political propaga	nda among any of the
	₩ Public Officials	☐ Newspapers		☐ Libraries	
	☐ Legislators	□ Editors		☐ Educational ins	stitutions
	☐ Government agencies ☐ Other (specify)	☐ Civic groups o		☐ Nationality gro	-
21.	What language was used in the English	nis political propaganda:	(specify)	77-1-18	
22.	Did you file with the Registrat disseminated or caused to be	ion Section, U.S. Department disseminated during this 6 r	of Justice, two copies o	feach item of politica d? Yes ₩	l propaganda material No □
23.	Did you label each item of su Yes № No □	ch political propaganda mater	ial with the statement	required by Section	4(b) of the Act?
24.	Did you file with the Registrat propaganda material as requir	tion Section, U.S. Department red by Rule 401 under the Ac	of Justice, a Dissemint? Yes E	ation Report for each	item of such political
		VI—EXHIBITS AN	D ATTACHMENTS		
25.	EXHIBITS A AND B				
	(a) Have you filed for each of	the newly acquired foreign p	rincipals in Item 9 the	e following:	
	Exhibit A ⁶ Yes 5 Exhibit B ⁷ Yes 5				
	If no, please attach the re	quired exhibit.			
	(b) Have there been any cha during this six month per		previously filed for an No □	y fo <u>reign</u> principal w	hom you represented
	If yes, have you filed an a	mendment to these exhibits?	Yes ⊠	No 🗆	
	If no, please attach the re	quired amendment.			
	,				

⁶The Exhibit A, which is filed on Form CRM-157 (Formerly OBD-67) sets forth the information required to be disclosed concerning each foreign principal.

The Exhibit B, which is filed on Form CRM-155 (Formerly OBD-65) sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

26.	EXHIBIT C			(INGL)
	If you have previously filed an Exhibit C ⁸ , state whether period. Yes □ No □	any changes there	in have occurred during this 6	month reporting
	N/A			
	If yes, have you filed an amendment to the Exhibit C?	Yes □	No □	
	If no, please attach the required amendment.			
27.	SHORT FORM REGISTRATION STATEMENT		2.00	
	Have short form registration statements been filed by all of Yes ☑ No □	the persons named	in Items 5 and 7 of the suppler	nental statement?
	If no, list names of persons who have not filed the requir	ed statement.		
	N/A			
acc	e attached exhibits and that he is (they are) familiar with the extrate to the best of his (their) knowledge and belief, excep extracy of the information contained in attached Short Forn thin his (their) personal knowledge.	t that the undersig n Registration Stat	ned make(s) no representation ement, if any, insofar as such	as to the truth or
		(Type or print t	name under each signature)	
	(Both copies of this statement shall be signed and sworn to before a notary public or r person authorized to administer oaths by the agent, if the registrant is an individual,	lu.	Canyer	
	y a majority of those partners, officers, directors or persons performing similar tions who are in the United States, if the registrant is an organization.)	William	D. Rogers	
	a	aton D.C		
	Subscribed and sworn to before me at Washin	qton, D.C.		
				•
	s day of February	, 19_ <u>92</u>		
thi				
thi				
thi		~		
thi		9	Signature of notary or other offic	Sypon

My Commission Expires May 14 1994

The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, constitution, and bylaws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause upon written application to the Assistant Attorney General, Criminal Division, Internal Security Section, U.S. Department of Justice, Washington, D.C. 20530.)

UNITED STATES DEPARTMENT OF JUSTICE REGISTRATION UNIT CRIMINAL DIVISION WASHINGTON, D.C. 20530

NOTICE

occupance with your supp	
1 dwarer fo Trem	16 of Section V (Political Form CRM-154, formerly Form OBD-64 -):
Yes X	_ or No
(If your answer to question question 2 of this form.)	
2. Do you disseminate any registration:	material in connection with your
Yes	or No
film catalogs, posters, broc which you have disseminated	2 is "yes" please forward for the material including: films, thures, press releases, etc. during the past six months.)
Signature	February 14, 1992
Signature	Date
William D. Rogers	& 5° √
Please type or print name of signatory on the line above	
Partner	18 All
Title	

Attachment 5A

5.	Has any person named in	ltem 4	rendered	services
	directly in furtherance	of the	interests	of any
	foreign principal?			

() Yes

(<u>XX</u>) No ★/

If yes, identify each such person and describe his services.

*/ However, the following persons, who became partners in the Registrant during earlier reporting periods, began to render services to one or more of the Registrant's foreign principals during this period:

Samuel A. Flax Dennis G. Lyons Keith M. Pattiz

Attachment 6A

6. Have any employees or individuals other than officials, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period?

(xx) Yes

If yes, furnish the following information:

Name

Position or Connection Date Terminated

Eileen Bannon

Associate

August 2, 1991

Lauren M. Biszewski

Associate

June 28, 1991

In addition, the following employees, who have previously filed Short Form Registration Statements, are not rendering services to any of the Registrant's foreign principals, and their Short Form Registration Statements are hereby terminated:

> Paolo W. Carozza Scott S. Dahl James P. Joseph Kathleen Kelly Nancy C. Loeb Sheila M. Nix Laura L. Sessums Sarah J. Williams



Attachment 7A

7. During this 6 month reporting period, have any persons been hired as employees or in any other capacity by the registrant who rendered services to the registrant directly in furtherance of the interests of any foreign principal in other than a clerical or secretarial, or in a related or similar capacity?

 (\overline{xx}) Yes

(<u></u>) No

If yes, furnish the following information

Name	Residence	Position or <u>Connection</u>	Date Connection Began
Rebecca Slaman	161 W. 88th St., #3 New York, NY 10011	Associate	07/15/91

In addition, the following persons, hired previously, began to render services to one or more of the Registrant's foreign principals during this period:

Name	Address	Position or Connection	Date Connection Began
Susan R. Benda	1840 Mintwood Pl., NW #103 Washington, DC 20009	Associate	09/10/90
William E. Cook, Jr.	1701 - 16th Street, NW #127 Washington, DC 20009	Associate	09/26/88
Cheryl A. Kettler	4903 Edgemoor Lane #219 Bethesda, MD 20814	5 Associate	09/06/88
Marcia B. Kuntz	2100 Newport Place, NW #5 Washington, DC 20009	Associate	10/02/89
Robert Raben	1221 Massachusetts Ave N.W. #819 Washington, DC 20005	., Associate	10/09/90
Laura L. Sessums	7106 44th Street Chevy Chase, MD 20815	Associate	06/03/85

Name	Address	Position or Connection	Date Connection Began
Kathleen M.H. Wallman	9332 Ramey Lane Great Falls, VA	Associate 22066	01/20/87
Andrew Zlotnick	176 W. 87th St., New York, NY 100		05/07/90

Attachment 9A

9. Have you acquired any new foreign principal during this 6 month reporting period?

 (\overline{XX}) Yes

If yes, furnish the following information

Name and Address of Foreign Principal

Date Acquired

Republic of Argentina Ministry of Economy Hipolito Yrigoyen 250 Buenos Aires, Argentina June 1991

Bank of Montreal First Canadian Place Toronto, Ontario M5X 1Al Canada

April 1984 */

Ameribrom, Inc. 52 Vanderbilt Avenue New York, NY 10017 February 1985 */

*/ Prior to this 6 month reporting period, representation of this foreign principal was limited to activities exempt from registration under Section 3 of the Act.

Attachment 10A

10. In addition to those named in Items 8 and 9, if any, list the foreign principals whom you continued to represent during the 6 month reporting period.

Asociacion Colombiana de Exportadores de Flores (Asocolflores)

Asociacion de Productores de Salmon y Trucha de Chile (A.G.)

Banco Central do Brasil

British American Arts Association (U.K.) Ltd.

Canadian Meat Council

Government of Brazil

Government of Canada

Government of Chile

Joint Exchanges Committee

Komatsu, Ltd.

Profilo Holding A.S.

Republic of Venezuela

State of Israel

Suramerica de Aleaciones Laminadas, C.A. (Sural)

The International Commodities Clearing House, Ltd.

The International Petroleum Exchange of London Limited

The London Commodity Exchange (1986) Ltd. (known also as the London Futures and Option Exchange and the London Fox)

The London International Financial Futures Exchange Ltd.

Thomson-CSF

Attachment 11A

11. During this six month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in items 8, 9 and 10 of the statement?

 (\overline{xx}) Yes $(\underline{\ })$ No

If yes, identify each such foreign principal and describe in full detail your activities and services:

Ameribrom, Inc.

The Registrant rendered advice to the foreign principal on U.S. laws, regulations, and policies concerning environmental issues, import duties and other matters of interest to the foreign principal. The Registrant also assisted the foreign principal in negotiations with the Environmental Protection Agency concerning Toxic Substances Control Act regulatory matters. In addition, the Registrant gathered information and had contacts with individuals in the United States Trade Representative's office regarding tariffs on bromine-based chemical products. See also response to Question 12.

Asociacion de Productores de Salmon y Trucha de Chile (A.G.)

The Registrant rendered advice to the foreign principal on U.S. laws, regulations, and policies in connection with trade matters affecting Chilean exports of fresh salmon to the United States.

Asociacion Venezolana de Productores de Cementos

The Registrant rendered advice and represented the foreign principal before the U.S. International Trade Commission and the Department of Commerce with respect to antidumping and countervailing duty investigations of imports of cement from Venezuela. The Registrant gathered information and had contacts with individuals involved in the cement trade and federal government officials which did not constitute political activity.

Asociacion Colombiana de Exportadores de Flores

The Registrant rendered advice to the foreign principal on U.S. laws, regulations, policies, and proposed legislation concerning international trade, customs classification, the Andean Trade Preferences Act, and other matters of interest to the foreign principal. In addition, the Registrant represented the foreign principal in 1991 GSP reviews and in ongoing antidumping and countervailing duty annual reviews by the U.S. Department of Commerce concerning imports of flowers from Colombia, as well as in appeals of such reviews before the U.S. Court of International Trade. See also response to Question 12.

Banco Central do Brasil/Government of Brazil

The Registrant rendered advice to the foreign principal on U.S. laws, regulations, and policies concerning export controls, international trade, international banking, taxation, and securities. The Registrant represented the foreign principal with respect to the restructuring of Brazilian external commercial bank debt. The Registrant also rendered advice and provided services concerning the privatization of USIMINAS, a government-owned steel company.

Bank of Montreal

The Registrant rendered advice to the foreign principal in connection with pending civil lawsuits concerning the liability of U.S. banks for deposits in foreign branches, represented the foreign principal in one such lawsuit, and rendered advice to the foreign principal with respect to the potential impact of legislation on pending cases. The Registrant also rendered advice to the foreign principal on U.S. laws, regulations, and policies concerning loan transactions, investment funds, and general securities and bankruptcy matters. See also response to Question 12.

Attachment 11A - page 2 -

British American Arts Association (U.K.) Ltd.

No activity.

Canadian Meat Council

The Registrant provided advice and representation with respect to follow-up to decisions by bi-national panels and an extraordinary challenge committee in connection with the International Trade Commission and Department of Commerce decisions in countervailing duty proceedings on imports of fresh chilled and frozen pork from Canada.

Government of Canada

The Registrant rendered advice to the foreign principal on U.S.-Canada Free Trade Agreement issues and U.S. laws, regulations, and policies relating thereto. The Registrant also rendered advice to the foreign principal on U.S. trade and tax laws, regulations, and policies.

Government of Chile

The Registrant rendered advice to the foreign principal regarding a claim filed with the Department of Health and Human Services under the U.S. Federal Tort Claims Act concerning damages suffered due to the U.S. embargo on Chilean grapes. See also response to Question 12.

Joint Exchanges Committee

No activity.

Komatsu Ltd.

The Registrant rendered advice to the foreign principal on U.S. laws, regulations, and policies of interest to the foreign principal in the conduct of its businesses, including tax and customs issues. In addition, the Registrant also advised and represented the foreign principal and one of its subsidiaries in connection with the purchase of the Latin American business of Komatsu Dresser Company. The Registrant also represented and rendered advice to the foreign

Attachment 11A - page 3 -

principal in connection with its joint venture investment in Cybermation Cutting Systems, Inc.

Profilo Holding A.S.

The Registrant rendered advice to the foreign principal on U.S. laws, regulations, policies, and proposed legislation that could affect or relate to activities of the foreign principal and U.S.-Turkey relations.

Republic of Argentina

The Registrant advised the foreign principal with respect to the sale of its thirty percent interest in Telefonica de Argentina S.A. In connection with the foregoing and otherwise, the Registrant rendered advice to the foreign principal on U.S. tax and securities laws, regulations, and policies. The Registrant also provided general advice with respect to relationships with multinational financial institutions. See also response to Question 12.

Republic of Venezuela

The Registrant assisted the foreign principal in connection with the negotiation, drafting, preparation and implementation of the 1990 Financing Plan. addition, the Registrant provided advice to the foreign principal with respect to international trade issues including the U.S. embargo of Venezuelan tuna, a Federal Maritime Commission Section 19 proceeding and the settlement thereof, and the consequences of Venezuela's GATT accession. The Registrant also provided advice on U.S. securities laws, regulations, and policies relating to the issuance of government bond offerings in the Euro market, as well as advice on a variety of matters relating to financing activities, including issuance of debt securities on Luxembourg and Frankfurt stock exchanges and trade financing facilities. See also response to Question 12.

State of Israel

The Registrant rendered advice to the foreign principal on U.S. laws, regulations and policies including taxation, international trade, financial

Attachment 11A - page 4 -

matters, and privatization issues. The Registrant also provided advice to the foreign principal regarding the implications of the new federal Credit Reform Act on the foreign principal's U.S. loan guarantees. The Registrant represented the foreign principal in connection with Exim bank financing and provided advice with respect to various financing vehicles, existing and proposed, including international development financing. In connection with the foregoing and otherwise, the Registrant rendered advice to the foreign principal on U.S. banking, tax, and securities laws, regulations, policies and proposed legislation concerning loan programs of the foreign principal, including possible export import bank financing for such loans. During this period, there was no activity for Israel Military Industries.

Suramerica de Aleaciones Laminadas, C.A.

The Registrant rendered advice to the foreign principal on U.S. laws, regulations, and policies concerning international trade, customs, and finance issues. The Registrant also advised and represented the foreign principal in connection with commercial transactions. In addition, the Registrant represented the foreign principal in antidumping and countervailing duty proceedings with respect to electrical conductor aluminum redraw rod before the U.S. Department of Commerce and the U.S. Court of Appeals for the Federal Circuit. The Registrant also advised and represented the foreign principal on U.S. customs matters related to classification issues.

The London Commodity Exchange (1986) Ltd. (known also as the London Futures and Options Exchange and the London Fox)

The Registrant rendered advice to the London Futures and Options Exchange concerning proposed U.S. legislation that would restrict trade in Cuban commodities by foreign subsidiaries of U.S. companies.

The International Commodities Clearing House, Ltd.

No activity.

Attachment 11A - page 5 -

The International Petroleum Exchange of London, Ltd.
No activity.

The London International Financial Futures Exchange Ltd.
No activity.

Thomson-CSF

No activity.

Attachment 11A - page 6 - 34

Attachment 12A

12. During this six-month reporting period, have you on behalf of any foreign principal engaged in political activity as defined below?

 (\overline{xx}) Yes $(\underline{\overline{}})$ No

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the Registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

Ameribrom, Inc.

On behalf of the foreign principal, the Registrant had a telephone conversation with Jon Sheiner, Tax Counsel for Congressman Rangel, on November 22, 1991 with regard to advice on import duties on sodium bromide.

The Registrant also met with the following government officials: On August 2, 1991 with Michael Brownrig and on September 25, 1991 with Scott Pierson, both officials from the Office of the U.S. Trade Representative; on October 25, 1991 with Congressman Thomas Downey; on October 28, 1991 with Congressman Raymond McGrath; on November 1, 1991 with Meredith Broadbent of the House Ways and Means Committee; and on November 1, 1991 with Jon Sheiner, Legislative Counsel for Congressman Charles Rangel. The Registrant also had telephone conversations with the following persons: August 2, 1991 with T. Costallis, Commodity Analyst, Department of Commerce; on August 6 and August 14, 1991 with Barbara Steinbock, Industry Analyst, Department of Commerce; on August 13 and August 14, 1991 with Ed Matusik, International Trade Commission; and on August 15, 1991 with Mary Ann Smith, Department of Commerce, and Michael Brownrig, from the Office of the U.S. Trade Representative. In addition, on behalf of the foreign principal, the Registrant sent letters on July 31, 1991

and August 8, 1991 to Anthony Kostalis of the Department of Commerce; sent a letter on August 9, 1991 to Barbara Steinbock of the Department of Commerce; sent letters on August 9 and August 14, 1991 to Ed Matusik, International Trade Commission; sent a letter on August 9, 1991 to Barbara Norm of the Office of the U.S. Trade Representative; and sent a letter on August 16, 1991 to Mary Anne Smith of the International Trade Administration. All contacts were in connection with tariffs on bromine-based chemical products.

Asociacion Colombiana de Exportadores de Flores

On behalf of the foreign principal, the Registrant had a telephone conversation on July 28, 1991 with Ralph Ives, Office of the U.S. Trade Representative in connection with House Trade Subcommittee hearings on the Andean Trade Preferences Act. The Registrant also had a telephone conversation on July 29, 1991 with Barbara Enser, Colombia Desk Officer at the Department of State, to discuss the Floral Trade Council's petition to remove GSP status for cut flowers from Colombia and elsewhere.

Bank of Montreal

On behalf of the foreign principal, the Registrant sent a letter dated September 11, 1991 to Patrick Mulloy, Senior Counsel, Senate Banking Committee; sent a letter dated September 11, 1991 to Raymond Natter, General Counsel, Senate Banking Committee; and had telephone conversations with Mr. Natter on September 19 and 20, 1991. All contacts were made in support of proposed insert 1131 of Senate Bill 543 regarding liability of U.S. banks for deposit in foreign branches. See also response to Item V - Political Propaganda.

Government of Chile

On behalf of the foreign principal, the Registrant had a meeting on July 17, 1991 with Myles Frechette, Assistant U.S. Trade Representative for Latin America, the Caribbean and Africa in connection with the Chilean grape trade. The Registrant also had a telephone conversation with Lawrence Eagleburger, Deputy Secretary of State, on August 21, 1991 and telephone conversations

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with Andrew Sens, an official with the State Department on August 22 and August 23, 1991 with regard to the import of Chilean grapes.

Republic of Argentina

On behalf of the foreign principal, the Registrant had a meeting on June 27, 1991 and telephone conversations on June 13, 14, 21 and 25, 1991 with Lawrence Eagleburger, Deputy Secretary of State, in connection with the Argentine economy.

Republic of Venezuela

On behalf of the foreign principal, the Registrant had meetings on September 26, 1991 with Carmen Blondin, Deputy Assistant Secretary, Commerce Department; on September 5, 1991 and October 1, 1991 with Marlene Brotman, Staff Member for Senator John Kerry; on September 27, 1991 with David Colson and Brian Hallman from the Office of Fisheries Affairs, State Department; on October 1, 1991 with Penny Palton, Staff Assistant, Senate Commerce Committee; on October 2, 1991 with Henry Beasley from Commerce Department and William Fox and Jane Early from National Oceanic and Atmospheric Administration; on October 18, 1991 with Chris Dawson and Michael Young, Economic Affairs Officials with the State Department; and on October 21, 1991 with Senator Bob Packwood and aides. All discussions were in connection with the Venezuelan tuna issue. See also response to Item V - Political Propaganda.

State of Israel

The Registrant met with James Bond, Minority Clerk, Appropriations Subcommittee on Foreign Operations on June 6, 1991; July 1, July 8, July 17, and July 25, 1991; September 25, 1991; October 8, 1991; and November 12, 1991. The Registrant also had telephone conversations with Mr. Bond on June 13 and June 19, 1991; July 9 and July 10, 1991; August 5, 1991; September 12, September 16, September 26, 1991; and October 7, 1991. In addition, the Registrant met with Mr. Bond and Art Rynearson of the Senate Legislative Counsel's Office on July 25, 1991 and had telephone conversations with Mr. Bond and Mr. Rynearson on July 29, July 30, and July 31, 1991. All meetings and conversations involved technical assistance on proposed legislation.

On behalf of the foreign principal, the Registrant had a telephone conversation on October 7, 1991 with Michael Kitay of the Office of General Counsel for the Agency for International Development regarding general legislative issues.

Attachment 12A - page 4 -

ATTACHMENT NO. 14A

14.(a) Receipts -- Monies

During this 6 month reporting period, have you received from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise?

(X)	Yes	() No
\ <u></u> /	162	\/NO

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.

<u>Date</u> <u>From whom</u>

<u>Purpose</u>

Amount

The following information relates to activities that would be exempt from registration under Section 3 of the Act, as well as activities that are not exempt.

The activities may have been performed in a prior period.

Venezuela, Gov't of			
07/31/91 Venezuela, Gov't of	Fees	\$	136,845.00
07/31/91 Venezuela, Gov't of	Disbursements	т	390,762.64
09/25/91 Venezuela, Gov't of	Fees		93,789.14
09/25/91 Venezuela, Gov't of	Disbursements		10,495.02
	Fees		284,959.76
11/05/91 Venezuela, Gov't of	Disbursements		57,511.20
11/05/91 Venezuela, Gov't of		·	
	Total Fees	\$	515,593.90
	Total Disbs.		458,768.86
Government of Canada	-		11 510 75
06/26/91 Government of Canada	Fees	\$	11,518.75
06/26/91 Government of Canada	Disbursements		1,479.60
07/22/91 Government of Canada	Fees		3,350.00
07/22/91 Government of Canada	Disbursements		145.05
10/01/91 Government of Canada	Fees		4,627.50
10/01/91 Government of Canada	Disbursements		1,224.45
10/16/91 Government of Canada	Fees		23,428.75
10/16/91 Government of Canada	Disbursements		885.01
	Total Fees	\$	42,925.00
	Total Disbs.	·	3,734.11
Banco Central Do Brasil and			•
Government of Brazil			
06/11/91 Banco Central Do Brasil	Fees	\$	153,178.65
06/11/91 Banco Central Do Brasil	Disbursements	•	5,047.60
06/18/91 Banco Central Do Brasil	Fees		120,861.09
06/18/91 Banco Central Do Brasil	Disbursements		3,467.91
07/29/91 Banco Central Do Brasil	Fees		115,614.10
07/29/91 Banco Central Do Brasil	Disbursements		12,224.40
09/06/91 Banco Central Do Brasil	Fees		76,005.36
09/06/91 Banco Central Do Brasil	Disbursements		1,608.39
09/16/91 Banco Central Do Brasil	Fees		71,167.50
09/16/91 Banco Central Do Brasil	Disbursements		17.702.29
ANTENNAT DUNCO CENTRAL DO DEGRET	Total Fees	\$	536,826.70
		φ	
	Total Disbs.		40,050.59

Date From whom	<u>Purpose</u>	<u>Amount</u>
Profilo Holding, A.S. Enka Holding Yatirim, A.S. Halk Sigorta T.A.S. Sezai Turkes-Feyzi Akkaya Construction Co. Tansit Sanayi Iktisat Bankasi Ak-PA Tekstill Ihracat Pazarlama, A.S. Fentex International Corp. 07/10/91 Iktisat Bankasi 07/11/91 Ak-PA Tekstill Ihracat Pazarlama 07/15/91 Enka Holding 07/29/91 Sezai Turkes-Feyzi Akkaya 07/31/91 Ak-PA Tekstill Ihracat Pazarlama 09/11/91 Fentex International 10/21/91 Ak-PA Tekstill 10/23/91 Iktisat Bankasi 10/29/91 Iktisat Bankasi 11/08/91 Enka Holding 11/08/91 Iktisat Bankasi	Fees Fees Fees Fees Fees Fees Fees Fees	\$ 10,800.00 3,600.00 7,183.20 3,600.00 3,600.00 7,188.00 7,188.00 3,600.00 3,600.00 3,590.00
State of Israel 08/05/91 State of Israel 08/05/91 State of Israel 08/13/91 State of Israel 08/13/91 State of Israel	Fees Disbursements Fees Disbursements	\$ 53,961.20 \$ 19,469.23 11,428.50 1,354.00 468.40
08/23/91 State of Israel 10/25/91 State of Israel 10/25/91 State of Israel	Fees Fees Disbursements Total Fees Total Disbs.	7,137.00 37,228.49 3,153.81 \$ 65,188.72 15,050.71
<u>Israel Military Industries</u> 07/08/91 Israel Military Industries	Fees	\$ 135.25
Sural Ca. 08/28/91 Sural Ca 08/28/91 Sural Ca 10/25/91 Sural Ca 10/25/91 Sural Ca	Fees Disbursements Fees Disbursements Total Fees Total Disb	\$ 8,511.25 283.03 9,792.50 3,963.59 \$ 18,303.75 4,246.62

<u>Date</u>	From whom	<u>Purpose</u>	<u>Amount</u>	
Asocolfl	ores			
	Asocolflores	Fees	\$	73,497.45
	Asocolflores	Disbursements		84,249.70
	Asocolflores	Fees		7,163.80
	Asocolflores	Disbursements		8,886.20
	Asocolflores	Fees		138,986.67
	Asocolflores	Disbursements		91,295.05
06/24/91	Asocolflores	Fees		597.50
06/24/91	l Asocolflores	Disbursements		1,466.25
06/26/91	l Asocolflores	Fees		13,539.63
06/26/91	l Asocolflores	Disbursements		4,859.37
	l Asocolflores	Fees		28,509.12
06/28/91	l Asocolflores	Disbursements		30,711.56
07/02/91	l Asocolflores	Fees		26,206.25
07/02/91	l Asocolflores	Disbursements		11,400.57
07/11/9	l Asocolflores	Fees		2,886.98
07/11/9	l Asocolflores	Disbursements		8,442.22
07/15/93	L Asocolflores	Fees		31,699.27
08/26/93	l Asocolflores	Fees		38,456.54
	l Asocolflores	Fees		4,405.00
	l Asocolflores	Disbursements		21.68
	l Asocolflores	Fees		33,907.20
	l Asocolflores	Disbursements		5,522.58
	l Asocolflores	Fees		20,445.66
	l Asocolflores	Fees		1,509.00
	1 Asocolflores	Fees		16,692.50
	1 Asocolflores	Disbursements		2,748.93
	1 Asocolflores	Fees		14,411.05
	1 Asocolflores	Disbursements		768.42
	1 Asocolflores	Fees		17,642.12
	l Asocolflores	Disbursements		6,701.88
	l Asocolflores	Fees		8,257.88
11/25/9	1 Asocolflores	Fees		4,120.92
		Total Fees	\$	482,934.54
		Total Disbs.		257,074.41
	ion de Productores de			
<u>Salmon</u>	y. Trucha de Chile (A.G.)	_		41 004 46
	l Asociacion de Productores de	Fees	\$	41,094.46
09/23/9	1 Asociacion de Productores de	Disbursements		8,555.40

<u>Date</u>	From Whom	<u>Purpose</u>	Amo	unt
06/20/91 06/20/91 07/25/91 07/25/91 09/18/91 09/18/91 10/28/91	Meat Council Canadian Meat Council	Fees Disbursements Fees Disbursements Fees Disbursements Fees Disbursements Total Fees Total Disb.	\$ 	62,950.00 2,900.42 29,110.00 1,537.31 5,110.00 1,252.77 430.00 617.42 97,600.00 6,307.92
Producto 06/07/91 06/07/91 08/19/91 10/04/91 10/16/91 10/16/91 10/30/91 11/18/91	ion Venezolana de ores de Cementos L Asociacion Venezolana de	Fees Disbursements Fees Fees Disbursements Fees Disbursements Fees Fees Disbursements Total Fees Total Disb.	\$ \$	24,656.25 35,832.63 10,257.50 105,547.22 16,725.30 118,818.75 18,595.05 1,648.00 81,963.75 36,503.64 342,891.47 107,656.62
06/27/91 09/25/91 09/25/91 10/21/91 10/29/91 10/29/91 10/30/91 11/11/91 11/11/91	Ltd. 1 Komatsu Ltd. 1 Komatsu Ltd. 1 Komatsu Ltd. 1 Komatsu Ltd. 1 Komatsu Ltd. 1 Komatsu Ltd. 1 Komatsu Ltd. 1 Komatsu Ltd. 1 Komatsu Ltd. 1 Komatsu Ltd. 1 Komatsu Ltd. 1 Komatsu Ltd. 1 Komatsu Ltd. 1 Komatsu Ltd. 1 Komatsu Ltd. 1 Komatsu Ltd. 1 Komatsu Ltd. 1 Komatsu Ltd. 1 Komatsu Ltd.	Fees Disbursements Fees Disbursements Fees Disbursements Fees Disbursements Fees Fees Disbursements Fees Total Fees Disbursements Total Disb.	\$	3,410.00 121.10 12,445.00 522.05 5,470.00 1,219.50 6,420.00 470.62 6,497.38 10,840.00 225.02 28,950.00 721.93 74,032.38 3,280.22

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<u>Date</u>	From whom		<u>Purpose</u>	Amo	<u>unt</u>
06/14/91 06/14/91 06/17/91 06/17/91 07/02/91 07/03/91	Montreal Bank of Montreal		Fees Disbursements Fees Disbursements Fees Fees	\$	3,175.00 324.42 1,400.00 903.27 472.50 6,872.50
07/08/91 07/08/91 08/02/91 08/02/91 09/10/91 09/10/91	Bank of Montreal		Disbursements Fees Disbursements Fees Disbursements Fees Disbursements Fees Fees		1,764.87 693.75 857.29 8,081.25 231.07 9,176.25 744.80
11/04/91 11/04/91 11/22/91 11/22/91 12/04/91	Bank of Montreal Bank of Montreal Bank of Montreal Bank of Montreal Bank of Montreal Bank of Montreal		Fees Disbursements Fees Disbursements Fees Disbursements Total Fees	\$	1,023.75 12,858.75 1,705.53 1,608.75 1,692.25 2,238.75 145.76 47,601.25
Ameribro 06/06/91	<u>m, Inc.</u> Ameribrom, Inc.		Total Disbs.	·	8,369.26
06/06/91 07/22/91 07/22/91 08/16/91 08/16/91 09/10/91 10/07/91 10/07/91 11/06/91	Ameribrom, Inc.	,	Fees Disbursements Fees Disbursements Fees Disbursements Fees Disbursements Fees Disbursements Fees Disbursements	\$	635.00 35.35 2,345.00 117.52 3,135.00 175.98 5,710.00 620.44 2,575.00 577.87 3,804.50 65.26
07/15/91 08/26/91	Thomson-CSF Thomson-CSF Thomson-CSF		Total Fees Total Disb. Fees Disbursements Fees	\$	18,204.50 1,592.42 21,685.00 412.32 7,400.00
09/13/91	Thomson-CSF Thomson-CSF Thomson-CSF		Disbursements Fees Disbursements Total Fees Total Disb.	COPPERENTED	264.11 280.00 88.05 29,365.00 764.48

Attachment No. 14A -Page 5-

Attachment No. 15A

15.(a) <u>Disbursements -- Monies</u>

During this 6 month reporting period, have you

(1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 8, 9 or 10 of this statement?

X) Yes	 No

(2) transmitted monies to any such foreign principal?

Yes (X) No
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If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

Date

To Whom

Purpose

Amount

The following information relates to activities that would be exempt from registration under Section 3 of the Act, as well as activities that are not exempt.

The services to which these expenditures relate may have been performed in a prior period.

State of Israel

Various	Lexis	Computer Research	3,599.63
Various		Computer Research	133.20
Various		Telephone	632.06
Various		Telephone	54.35
Various		Duplicating	5,072.25
Various	U.S. Postal Service	Postage	37.45
Various		Cash Expenses	680.53
Various		Local Transportation	
06/10/91	Chaco Courion Sanuica Inc	Local Transportation	1,026.66
Various		Courier	124.95
	J +J = = = = = = = = = = = = = = = = = =	Courier	411.00
Various		Courier	146.70
Various	Apple Courier	Courier	131.00
Various		Courier	61.00
Various	y .	Courier	355.00
Various		Courier	380.25
06/10/91	Pitney Bowes Management	Outside Duplicating	196.00
07/02/91	Allen W. Wasmund & Son	,	
	21 Harrison Ave.		
	Waldwick, NJ 07463	Professional Serv.	2,711.06
08/07/91	Columbia Law School Library	Publications	20.08
	Research Information Services	Document Retrieval	84.65
		TOTAL	\$15,857.82
			4101007.02

<u>Date</u>	To Whom	Purpose	Amount			
<u>Israel M</u>	<u>Israel Military Industries</u>					
Various	Xerox Corporation	Duplicating TOTAL	\$ 7.50 \$ 7.50			
London F	<u>ox</u>					
Various Various Various		Duplicating Telephone	\$ 124.75 24.69			
10/13/91	Washington, DC 20036	Professional Serv. Computer Research TOTAL	1,438.00 116.72 \$ 1,704.16			
<u>British</u>	Am. Art Assoc.					
Various Various Various	Xerox Corporation C & P Telephone A & P Employees U. S. Postal Service A&P Attorney	Duplicating Telephone Local Transportation Postage Travel Expense* TOTAL	\$ 37.90 95.00 37.08 10.55 906.00 \$ 1,086.53			
<u>Profilo</u>	Holding, A.S.					
Various Various 06/19/91	A & P Employees A & P Employees C & P Telephone U.S. Postal Services Federal Express Falcon Express	Duplicating Cash Expense Local Transportation Telephone Postage Courier Courier Computer Research	\$ 1,420.50 428.53 960.53 833.11 12.11 9.50 9.75 36.32			
Various	Washington, DC 20036 A&P Attorney	Professional Serv. Travel Expense* TOTAL	\$\begin{array}{c} 407.50 \\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \			

(Attachment No. 15A - page 2)

^{*} These travel expenses were for attorneys at the firm for travel in connection with activities referred to in Item 11, such as for meetings with clients and third parties, and not for Item 12 activities.

<u>Date</u>	To Whom	<u>Purpose</u>	Amount	
<u>Asocolfl</u>	ores			
Various Various Various Various 10/22/91 Various Various Various Various	A & P Employees C & P Telephone U.S. Postal Services A & P Employees United States Treasury Lexis Westlaw Falcon Express DHL Airways APCO Associates Three Lafayette Centre 1155 21st Street, N.W.	Duplicating Local Transportation Telephone Postage Cash Expenses Outside Duplicating Computer Research Computer Research Courier Courier	\$ 12,046.80 264.06 1,939.79 77.19 436.48 288.58 2,254.86 5.40 555.45 289.00	
Various Various 07/25/91	Washington, DC 20036 U.S. Customs Services Federal Express U.S. Department of Commerce Superintendent of Documents U.S. Court of International Trade Apple Courier Washington Express	Professional Serv. Document Retrieval Courier Document Retrieval Document Retrieval Filing Fees Courier Courier Professional Serv. (in antidumping case	3,815.04 34.23 58.50 60.15 12.50 120.00 28.75 315.14	
Various	Washington, DC 20006 A&P Attorneys	(in antidumping case) Travel Expenses* TOTAL	160,786.22 541.23 \$ 224,232.33	
The International Petroleum Exchange of London Limited				
10/31/91	Xerox Corporation	Duplicating TOTAL	\$ 17.75 \$ 17.75	
Thomson -	- CSF			
Various Various Various	Xerox Corporation C & P Telephone Falcon Express	Duplicating Telephone Courier TOTAL	\$ 9.50 12.16 74.25 \$ 95.91	

(Attachment No. 15A - page 3)

^{*} These travel expenses were for attorneys at the firm for travel in connection with activities referred to in Item 11, such as for meetings with clients and third parties, and not for Item 12 activities.

<u>Date</u>	To Whom	Purpose	Amount	
Government of Chile				
Various Various Various Various 6/11/91 8/22/91	Xerox Corporation C & P Telephone Apple Courier A & P Employees Karin Ruckhaus Lepon, McCarthy Jutkowitz 1146 19th Street, N.W. Third Floor	Duplicating Telephone Courier Cash Expense Professional Serv.	\$ 62.00 51.60 107.25 68.49 260.00	
	Washington, DC 20036	Professional Serv. TOTAL	\$\frac{563.36}{1,112.70}	
Asociaci Truch	on de Productores de Salmon y a de Chile (A.G.)			
Various 08/01/91 Various Various	C & P Telephone A & P Employees A & P Employees Lexis DHL Airways Falcon Express U.S. Department of Commerce	Duplicating Telephone Local Transportaion Cash Expenses Computer Research Courier Courier Document Retrieval Travel Expense* TOTAL	\$ 291.75 17.68 18.90 10.00 85.00 108.00 20.20 24.60 8.215.69 \$ 8,791.82	
Governme	nt of Cananda			
Various Various Various Various Various Various Various Various 08/07/91	Xerox Corporation Federal Express Falcon Express C & P Telephone A & P Employees A & P Employees Lexis Westlaw U.S. Postal Service Apple Courier Deluxe Delivery Systems Washington Express National News Agency APCO Associates Three Lafayette Centre 1155 21st Street, N.W.	Duplicating Courier Courier Telephone Cash Expenses Local Transportation Computer Research Computer Research Postage Courier Courier Courier Publications	\$ 773.70 200.60 85.25 48.87 79.96 162.70 1,817.04 473.40 .40 214.00 15.00 10.25 52.80	
Various	Washington, DC 20036 A&P Attorney	Professional Serv. Travel Expense* TOTAL	7,142.50 792.52 \$ 11,868.99	

(Attachment No. 15A - page 4)

^{*} These travel expenses were for attorneys at the firm for travel in connection with activities referred to in Item 11, such as for meetings with clients and third parties, and not for Item 12 activities.

<u>Date</u>	To Whom	<u>Purpose</u>	Amount
Governme	ent of Venezuela		
Various	Westlaw ABC Printing Network CPC Reprographics Inc. Federal Maritime Commission Long's Bookbinders Falcon Express Federal Express DHL Airways Deluxe Delivery Systems Delivery Fee-Japan-M.Stumpf Washington Express Apple Courier, Inc. World Courier National News Agency National Technical Information Research Information Services	Duplicating Telephone Telephone Local Transportation Cash Expenses Postage Computer Research Computer Research Outside Duplicating Outside Duplicating Outside Duplicating Courier	\$ 27,368.85 8,696.45 527.75 4,121.37 1,408.12 88.77 5,768.95 770.40 132.77 6,432.06 26.50 50.00 612.55 2,325.50 2,293.40 149.75 13.10 373.68 264.50 512.00 586.80 51.00 206.03
Various	12-32 Akasaka 1-Chome Minato-ku, Tokyo 107, Japan Showa Law Office Tsuruya Hachiman Bldg. 5F 2-4, Kojimachi	Professional Serv.	46,553.63
08/06/91	Chiyoda-ku, Tokyo 102, Japan Nagashima & Ohno 25 Ichibancho, Chiyoda-ku	Professional Serv.	4,357.56
08/06/91	Tokyo 102, Japan Hengeler, Mueller, Weitzel, Wirtz Bockenheimer Landstrasse 51	Professional Serv.	22,536.72
08/06/91	D-6000 Frankfurt 1, Germany Freshfields 14 Avenue Gourgaud	Professional Serv.	270,450.23
06/05/91	75017 Paris, France Studio Avv. Ercole Graziadei Via Vittario Veneto, 96	Professional Serv.	6,408.40
Various	Rome, Italy Gide Loyrette Nouel	Professional Serv.	64,086.96
	26, Cours Albert 1 75008 Paris, France	Professional Serv.	39,473.55

(Attachment No. 15A - page 5)

<u>Date</u>	To Whom	<u>Purpose</u>	Amount
Governme	nt of Venezuela (cont.)		
Various	Pestalozzi Gmuer & Heiz Loewenstrasse 1		
06/05/91	CH-8001 Zurich Loeff Clayes Verbeke P.O. Box 75088	Professional Serv.	39,329.85
09/30/91	NL-1070 AB Amsterdam The Law Debenture Refuge House	Professional Serv.	2,009.01
06/06/91	66 Gresham St. London EC2V 7HX, England Elvinger, Hoss & Prussen Avocats a la cour	Professional Serv.	1,684.32
06/06/91	15, Cote D'Etch B.P. 425 L-1450 Luxembourg Kroll Associates	Professional Serv.	9,180.00
Various	300 South Grand Ave. Los Angeles, CA 90071 CT Corporation P.O. Box 1421	Professional Serv.	9,778.22
Various	General Post Office New York, NY 10116-1421 Slaughter & May	Professional Serv.	2,288.50
Various	126 East 56th Street New York, NY 10022-3613 A&P Attorneys	Professional Serv. Travel Expense* TOTAL	6,890.00 22,827.42 \$ 610,634.67

(Attachment No. 15A - page 6)

^{*} These travel expenses were for attorneys at the firm for travel in connection with activities referred to in Item 11, such as for meetings with clients and third parties, and not for Item 12 activities.

<u>Date</u>	To Whom	<u>Purpose</u>	Amount
<u>Sural, C</u>	<u>A</u>		
Various 07/22/91 Various 06/17/91 Various Various 11/02/91	C & P Telephone A & P Employees A & P Employees U.S. Department of Commerce Federal Express Falcon Express Washington Express U.S. Postal Service	Duplicating Telephone Cash Expense Local Transportation Document Retrieval Courier Courier Courier Postage Computer Research Computer Research	\$ 1,079.50 386.87 23.00 16.50 .75 46.55 10.45 24.75 7.68 26.14 23.40 \$ 1,645.59
<u>Banco Ce</u>	ntral do Brasil		
Various Various 10/23/91 Various	C & P Telephone N Y Telephone Pitney Bowes Management U.S. Postal Service A & P Employees A & P Employees Lexis Westlaw Federal Express DHL Airways Deluxe Delivery Systems Falcon Express Apple Courier Washington Express Capitol District Information Price Waterhouse 1801 K Street, N.W.	Duplicating Telephone Telephone Outside Duplicating Postage Cash Expense Local Transportation Computer Research Computer Research Courier	\$ 13,919.47 4,546.16 3,317.87 14.00 70.19 1,415.80 3,255.11 1,763.04 1,427.40 40.50 1,848.43 223.00 231.40 333.90 61.25 179.87
Various	Washington, DC 20006 APCO Associates Three Lafayette Centre 1155 21st Street, N.W. Washington, DC 20036	Professional Serv.	8,463.54
Various	Superintendent of Documents	Professional Serv. Document Retrieval	7,912.22 137.25
Various	National News Agency	Publications	586.80
06/10/91	OECD Publications	Publications	32.86
08/16/91	Faxon Company	Publications	21.20
08/19/91	Orbis Publications, Ltd.	Publications	132.50
Various	A&P Attorneys	Travel Expense*	25,997.98
		TOTAL	\$ 75,931.74

(Attachment No. 15A - page 7)

^{*} These travel expenses were for attorneys at the firm for travel in connection with activities referred to in Item 11, such as for meetings with clients and third parties, and not for Item 12 activities.

<u>Date</u>	To Whom	Purpose	<u>Amount</u>
<u>Canadian</u>	Meat Council		
Various Various 06/12/91 Various Various	A & P Employees C & P Telephone Federal Express Apple Courier Falcon Express	Duplicating Local Transportation Telephone Courier Courier Courier Publications Depositions	\$ 732.25 104.68 43.70 283.25 16.50 134.30 52.80 97.09
	Washington, DC 20036	Professional Serv. TOTAL	\$\frac{1.658.50}{3,123.07}
<u>Ameribro</u>	m, Inc.		
Various 11/18/91 Various Various Various 08/08/91	U.S. Postal Service A & P Employees A & P Employees	Duplicating Telephone Postage Cash Expense Local Transportation Computer Research Outside Duplicating Courier TOTAL	\$ 1,070.75 64.52 1.21 123.05 97.50 555.76 200.68 36.60 \$ 2,150.07
Republic	of Argentina		
Various Various 12/01/91 11/14/91	C & P Telephone U.S. Postal Service A & P Employees A & P Employees Falcon Express Washington Express Lexis	Duplicating Telephone Postage Local Transportation Cash Expenses Courier Courier Computer Research Computer Research Seminar Document Retrieval Travel Expense* TOTAL	\$ 5,555.75 4,058.52 5.80 196.90 293.34 9.75 20.50 1,547.00 54.00 250.00 214.59 6,179.34 \$ 18,385.49

(Attachment No. 15A - page 8)

^{*} These travel expenses were for attorneys at the firm for travel in connection with activities referred to in Item 11, such as for meetings with clients and third parties, and not for Item 12 activities.

<u>Date</u>	To Whom	<u>Purpose</u>	Amount	
	on Venezolana de Productores mentos			
Various Various Various Various	Apple Courier	Duplicating Telephone Local Transportation Cash Expenses Courier Courier Courier Postage Computer Research Computer Research Courier	\$ 29,816.85 7,580.49 2,131.57 1,478.43 1,920.81 1,440.60 384.13 41.32 4,919.91 304.20	3 (3)
07/31/91	1155 21st Street, N.W. Washington, DC 20036 Josette Flores 1711 Euclid Street, N.W.	Professional Serv.	10,214.14	ļ
08/20/91	Washington, DC 20009 Juan Martin 10529 Democracy Lane	Professional Serv.	399.40)
07/12/91 07/22/91 09/03/91 07/10/91 10/22/91	Potomac, MD 20854 Research Information Service Disclosure U.S. Department of Commerce Superintendent of Documents Heritage Reporting Corporation Faxon Company ICF Consulting Association 1850 K Street, N.W.	Professional Serv. Document Retrieval Document Retrieval Document Retrieval Document Retrieval Depositions Publications	540.00 118.19 27.90 82.60 9.50 326.00 63.60)
Various	Suite 1000 Washington, DC 20006 A&P Attorneys	Professional Serv. (in trade cases) Travel Expense* TOTAL	7,595.05 14,251.02 \$ 83,662.71	2

(Attachment No. 15A - page 9)

These travel expenses were for attorneys at the firm for travel in connection with activities referred to in Item 11; such as for meetings with clients and third parties, and not for Item 12 activities?

<u>Date</u>	To Whom	<u>Purpose</u>	Amount
Bank of	<u>Montreal</u>		
Various Various Various Various 11/01/91 Various Various Various 09/27/91 06/26/91 07/15/91 09/20/91	Xerox Corporation C & P Telephone U.S. Postal Service A & P Employees A & P Employees Lexis Westlaw Federal Express Deluxe Delivery System Apple Courier, Inc. Washington Express Superintendent of Documents Capitol District Information Clerk, Southern District BNA Books Research Information Service CT Corporation P.O. Box 1421 General Post Office	Duplicating Telephone Postage Local Transportation Cash Expenses Computer Research Computer Research Courier Courier Courier Courier Publications Document Retrieval Filing Fees Publications Document Retrieval	\$ 3,218.28 656.80 8.09 306.30 164.37 535.13 156.60 748.92 40.75 22.00 21.75 43.75 220.67 120.00 49.82 1,143.76
Various	New York, NY 10116-1421 A&P Attorney	Professional Serv. Travel Expense* TOTAL	1,719.25 3.40 \$ 9,179.64
<u>Komatsu,</u>	Ltd.		
Various Various Various Various Various Various Various 10/01/91	Xerox Corporation C & P Telephone A & P Employees A & P Employees Federal Express Falcon Express Lexis Westlaw U.S. Postal Service Washington Express Apple Courier, Inc. Arthur Andersen & Co. 33 West Monroe Street Chicago, IL 60603 DHL Airways ICC Publishing Corporation	Duplicating Telephone Cash Expense Local Transportation Courier Courier Computer Research Computer Research Postage Courier Courier Professional Serv. Courier Publications	\$ 25,326.00 5,398.24 3,943.05 1,124.30 349.30 98.19 1,030.71 37.80 113.13 425.37 27.50 2,200.00 26.00 28.39
11/11/91 Various	CT Corporation P.O. Box 1421 General Post Office New York, NY 10116/1421 A&P Attorneys	Document Retrieval Travel Expense*	396.08 1.137.85 \$ 41,661.91

(Attachment No. 15A - page 10)

^{*} These travel expenses were for attorneys at the firm for travel in connection with activities referred to in Item 11, such as for meeting with clients and third parties, and not for Item 12 activities.

Attachment 15C

During this 6 month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office?

(<u>____)</u> Yes (<u>xx</u>) No <u>*</u>/

If yes, furnish the following information:

*/ However, the following persons who have filed Short Form Registration statements have made political contributions in connection with elections for federal offices:

<u>Date</u>	Amount or Thing of Value	Name of Name of Political Organization Candidate
NANCY ABRAMOWITZ 6/15/91 9/15/91	\$ 115.00 \$ 115.00	Arnold & Porter Partners PAC Various Arnold & Porter Partners PAC Various
WILLIAM BAER 6/15/91 9/10/91 9/15/91 11/1/91	\$ 150.00 \$ 250.00 \$ 150.00 \$ 150.00	Arnold & Porter Partners PAC Various Pelosi for Congress Nancy Pelosi Arnold & Porter Parters PAC Various Kerrey for President Bob Kerrey
PAUL S. BERGER 6/15/91 8/13/91 9/15/91 9/30/91 11/15/91 11/15/91 12/4/91	\$ 250.00 \$1,000.00 \$ 250.00 \$ 50.00 \$ 250.00 \$1,000.00 \$ 100.00	Arnold & Porter Partners PAC Various Kasten for Senate Robert Kasten Arnold & Porter Partners PAC Various Campaign for Joyce Grand Joyce Grand Hoyer for Congress Steny Hoyer Clinton for President Bill Clinton Peter Hoagland for Congress Peter Hoagland
<u>PETER BLEAKLEY</u> 6/15/91 9/15/91	\$ 250.00 \$ 250.00	Arnold & Porter Partners PAC Various Arnold & Porter Partners PAC Various

<u>Date</u>	Amount or Thing of Value	Name of Political Organization	Name of <u>Candidate</u>
MARK BOSCOE 6/15/91 9/15/91	\$ 95.00 \$ 95.00	Arnold & Porter Partners PAC Arnold & Porter Partners PAC	Various Various
<u>JEFF BURT</u> 9/15/91	\$ 200.00	Arnold & Porter Partners PAC	Various
HOWARD CAYNE 6/15/91 9/15/91	\$ 105.00 \$ 105.00	Arnold & Porter Partners PAC Arnold & Porter Partners PAC	Various Various
WHITNEY DEBEVOISE 6/15/91 9/15/91 6/7/91 10/8/91	\$ 125.00 \$ 125.00 \$ 500.00 \$1,000.00		Various Various m Campbell chard Thornburgh
A. PATRICK DOYLE 6/15/91 9/15/91	\$ 150.00 \$ 150.00	Arnold & Porter Partners PAC Arnold & Porter Partners PAC	Various Various
DOUGLAS DWORKIN 6/15/91 9/15/91	\$ 125.00 \$ 125.00	Arnold & Porter Partners PAC Arnold & Porter Partners PAC	Various Various
JAMES FITZPATRICK 6/15/91 8/10/91 9/15/91	\$ 250.00 \$ 250.00 \$ 250.00	Arnold & Porter Partners PAC Nancy Pelosi for Congress Na Arnold & Porter Partners PAC	Various ncy Pelosi Various
<u>SAMUEL FLAX</u> 6/15/91 9/15/91	\$ 150.00 \$ 150.00	Arnold & Porter Partners PAC Arnold & Porter Partners PAC	Various Various
MELVIN GARBOW 6/15/91 9/15/91	\$ 225.00 \$ 225.00	Arnold & Porter Partners PAC Arnold & Porter Partners PAC	Various Various

<u>Date</u>	Amount or Thing of Value	Name of Name of Political Organization Candidate
JOSEPH H. GUTTENTA 6/15/91 9/15/91 10/9/91	AG \$ 250.00 \$ 250.00 \$ 250.00	Arnold & Porter Partners PAC Various Arnold & Porter Partners PAC Various Clinton for President Bill Clinton
<u>JOHN H. JACKSON</u> 6/21/91	\$ 100.00	Michigan PAC on Behalf of Univ. Various
ROBERT JONES 6/15/91 9/15/91	\$ 175.00 \$ 175.00	Arnold & Porter Partners PAC Various Arnold & Porter Partners PAC Various
HARRY KATZ 6/15/91 9/15/91	\$ 150.00 \$ 150.00	Arnold & Porter Partners PAC Various Arnold & Porter Partners PAC Various
ABE KRASH 6/15/91 7/23/91 9/15/91 11/1/91	\$ 250.00 \$ 500.00 \$ 250.00 \$ 500.00	Arnold & Porter Partners PAC Various Wofford for Senate Harris Wofford Arnold & Porter Partners PAC Various Wofford for Senate Harris Wofford
KENNETH KRUPSKY 6/15/91 9/15/91	\$ 150.00 \$ 150.00	Arnold & Porter Partners PAC Various Arnold & Porter Partners PAC Various
MICHAEL LEE 6/15/91 9/15/91	\$ 115.00 \$ 115.00	Arnold & Porter Partners PAC Various Arnold & Porter Partners PAC Various
KENNETH LETZLER 6/15/91 9/15/91	\$ 200.00 \$ 200.00	Arnold & Porter Partners PAC Various Arnold & Porter Partners PAC Various
DENNIS G. LYONS 6/15/91 9/15/91	\$ 250.00 \$ 250.00	Arnold & Porter Partners PAC Various Arnold & Porter Partners PAC Various
ROBERT E. MANNION 6/15/91 9/15/91	\$ 150.00 \$ 150.00	Arnold & Porter Partners PAC Various Arnold & Porter Partners PAC Various

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<u>Date</u>	Amount or Thing of Value	Name of Political Organization	Name of <u>Candidate</u>
CATHERINE C. McCOY 6/15/91 7/2/91 9/15/91	¥ \$ 115.00 \$ 100.00 \$ 115.00	Arnold & Porter Partners PAC Republican Party of Virginia Arnold & Porter Partners PAC	Various Various Various
THOMAS MILCH 6/15/91 9/15/91	\$ 150.00 \$ 150.00	Arnold & Porter Partners PAC Arnold & Porter Partners PAC	Various Various
<u>NANCY MINTZ</u> 6/15/91 9/15/91	\$ 162.50 \$ 162.50	Arnold & Porter Partners PAC Arnold & Porter Partners PAC	Various Various
ROBERT MINTZ 6/15/91 9/15/91	\$ 75.00 \$ 75.00	Arnold & Porter Partners PAC Arnold & Porter Partners PAC	Various Various
BRUCE MONTGOMERY 6/15/91 9/15/91	\$ 250.00 \$ 250.00	Arnold & Porter Partners PAC Arnold & Porter Partners PAC	Various Various
IRVIN NATHAN 6/15/91 9/15/91	\$ 125.00 \$ 125.00	Arnold & Porter Partners PAC Arnold & Porter Partners PAC	Various Various
<u>KEITH PATTIZ</u> 6/15/91 9/15/91	\$ 150.00 \$ 150.00	Arnold & Porter Partners PAC Arnold & Porter Partners PAC	Various Various
<u>CLAIRE READE</u> 6/15/91 9/15/91	\$ 115.00 \$ 115.00	Arnold & Porter Partners PAC Arnold & Porter Partners PAC	Various Various
DANIEL REZNECK 6/15/91 9/15/91	\$ 250.00 \$ 250.00	Arnold & Porter Partners PAC Arnold & Porter Partners PAC	Various Various

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<u>Date</u>	Amount or Thing of Value	Name of Name of Political Organization Candidate
WILLIAM D. ROGERS 6/11/91 6/15/91 9/15/91	\$ 100.00 \$ 250.00 \$ 250.00	Citizens for Sen. Wofford Harris Wofford Arnold & Porter Partners PAC Various Arnold & Porter Partners PAC Various
RICHARD SCHIFTER 6/15/91 9/15/91	\$ 125.00 \$ 125.00	Arnold & Porter Partners PAC Various Arnold & Porter Partners PAC Various
LAWRENCE SCHNEIDER 6/15/91 9/15/91 9/24/91 10/20/91	\$ 175.00 \$ 175.00 \$1,000.00 \$ 50.00	Arnold & Porter Partners PAC Arnold & Porter Partners PAC Clinton Committee Price for Congress PAC Various Bill Clinton David Price
<u>CARY SHERMAN</u> 6/15/91 9/15/91 10/9/91	\$ 100.00 \$ 100.00 \$ 250.00	Arnold & Porter Partners PAC Various Arnold & Porter Partners PAC Various Pelosi for Congress Nancy Pelosi
MICHAEL SHOR 6/15/91 9/15/91	\$ 75.00 \$ 75.00	Arnold & Porter Partners PAC Various Arnold & Porter Partners PAC Various
JEFFREY H. SMITH 6/15/91 9/15/91 10/23/91	\$ 105.00 \$ 105.00 \$ 500.00	Arnold & Porter Partners PAC Various Arnold & Porter Partners PAC Various Clinton for President Bill Clinton
MICHAEL SOHN 6/15/91 9/15/91 11/7/91	\$ 250.00 \$ 250.00 \$1,000.00	Arnold & Porter Partners PAC Various Arnold & Porter Partners PAC Various Markey for Congress E. Markey
MARK STUMPF 6/15/91 9/15/91	\$ 175.00 \$ 175.00	Arnold & Porter Partners PAC Various Arnold & Porter Partners PAC Various
STEVEN TEPPER 6/15/91 9/15/91	\$ 62.50 \$ 62.50	Arnold & Porter Partners PAC Various Arnold & Porter Partners PAC Various

Date	Amount or Thing of Value		Name of Political Organization					Name of <u>Candidate</u>
<u>DANIEL WALDMAN</u> 6/15/91 9/15/91	\$	105.00 105.00				Partners Partners		Various Various
RICHARD WERTHEIME 6/15/91 9/15/91	<u>R</u> \$ \$	250.00 250.00		-		Partner : Partners		Various Various
ROBERT H. WINTER 6/15/91 9/15/91	\$ \$	250.00 250.00		_		Partners Partners		Various Various